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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

IN RE: FACEBOOK, INC. CONSUMER  
PRIVACY USER PROFILE LITIGATION

This document relates to:

ALL ACTIONS

MDL No. 2843  
Case No. 18-md-02843-VC-JSC

**JOINT STATUS UPDATE**

Judges: Hon. Vince Chhabria and  
Hon. Jacqueline Scott Corley  
Courtroom: VIA VIDEOCONFERENCE  
Hearing Date: Septemebr 21, 2021  
Hearing Time: 8:30 a.m.

Since the parties' August 22 submission, they had one full-day discovery mediation session. During that session, the parties worked with the mediators to address disputes regarding the sufficiency of both parties' document productions, the scope of particular document requests, whether certain document requests can be narrowed, and specific interrogatory responses.

The parties briefed disputes to Special Master Garrie regarding (i) TAR and (ii) notebooks from Mr. Zuckerberg. The parties and the mediators additionally have determined the parties to be at impasse on two issues—one regarding whether Mark Zuckerberg and Sheryl Sandberg should be added as custodians and the other regarding a dispute about Facebook's discovery responses related to "business partners." The parties will brief these issues to Mr. Garrie pursuant to the briefing procedures he has set.

On September 10, the parties had a pre-mediation session with the Honorable Jay Gandhi (Retired), during which he set a briefing and presentation schedule for an upcoming mediation session, which will be held on October 8.

Dated: September 20, 2021

Respectfully submitted,

KELLER ROHRBACK L.L.P.

By: /s/ Derek W. Loeser  
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**ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(i)(3)**

I, Lesley E. Weaver, am the ECF user whose identification and password are being used to file this document. In compliance with Local Rule 5-1(i)(3), I hereby attest that each of the Signatories herein concur in this filing.

Dated: September 20, 2021

/s/ Lesley E. Weaver

Lesley E. Weaver

**CERTIFICATE OF SERVICE**

I, Lesley E. Weaver, hereby certify that on September 20, 2021, I electronically filed the foregoing with the Clerk of the United States District Court for the Northern District of California using the CM/ECF system, which shall send electronic notification to all counsel of record.

/s/ Lesley E. Weaver  
Lesley E. Weaver